

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

EDWARD F. PLASTINO and, SECOND)	
AMENDMENT FOUNDATION, INC.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:12-cv-01316-CAS
)	
CHRIS KOSTER, in his Official Capacity as)	
Attorney General of the State of Missouri;)	
and TOM NEER, in his Official Capacity as)	
Sheriff of St. Charles County, Missouri,)	
)	
Defendants.)	
)	

Consent Motion for Additional Time to File a Responsive Pleading

Defendant Missouri Attorney General Chris Koster hereby moves this Court for an Order extending his time to file a responsive pleading by ten (10) days, up to and including November 9, and states in further support as follows:

1. On or about July 23, plaintiff filed his complaint alleging that Section 571.101.2(1) RSMo violates Amendments II and XIV of the U.S. Constitution and that the statute is preempted by federal authority regarding immigration.
2. On or about October 10, 2012, plaintiffs filed a motion for leave to file amended complaint, seeking to include additional allegations regarding standing of the plaintiffs. This was in response to Defendant Koster's motion to dismiss arguing plaintiffs' lack of standing.
3. On or about October 15, 2012, the Court granted plaintiffs' motion.
4. On or about October 16, 2012, the amended complaint was filed and

served on Defendant Koster.

5. Defendant Koster's responsive pleading was due October 30, 2012.
Defendant Koster requires additional time to respond to the amended complaint.

6. Plaintiffs consent to an additional ten (10) days, up to and including November 9, 2012, for Defendant Koster to file his responsive pleading.

7. No party would be prejudiced by this extension.

WHEREFORE Defendant Chris Koster requests that this Court grant Defendant an additional ten (10) days, up to and including November 9, 2012, to file a responsive pleading.

Respectfully submitted,

CHRIS KOSTER
Attorney General

By: /s/ Andrew M. Hartnett
Andrew M. Hartnett, Mo. Bar. No. 60034
Chief of Staff
John R. Phillips, Mo. Bar No. 55159
Assistant Attorney General
P.O. Box 899
Jefferson City, MO 65102
(573) 751-8807
FAX (573) 751-2203
andrew.hartnett@ago.mo.gov
john.phillips@ago.mo.gov

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of October, 2012, the foregoing
was electronically filed with the Clerk of the Court using the CM/ECF
system and served electronically using the CM/ECF system to:

David G. Sigale
Law Firm of David G. Sigale, P.C.
739 Roosevelt Rd., Ste. 304
Glen Ellyn, IL 60137

Matthew T. Singer
Law Office of Matthew T. Singer
6963 Waterman
St. Louis, MO 63130

/s/ Andrew M. Hartnett